reasons set forth above, Applicants respectfully request the objection to the drawings be withdrawn.

The rejection of Claims 1-4, 6, 8-11, and 15-17 under 35 U.S.C. § 103 as being anticipated by Schilling et al. in view of Horner et al. or Borkowicz et al. is respectfully traversed.

Schilling et al. describe a multiple annular combustion apparatus 25. Combustor apparatus 25 includes a domed end 35 that includes a plurality of domes 37, 39, and 41. Each dome 37, 39, and 41 includes a plurality of spaced openings that receive mixers for mixing air and fuel prior to entry into a common combustion chamber 29. Notably, Schilling et al. do not describe nor suggest water injection into domes 37, 39, and 41. Furthermore, Schilling et al. do not describe nor suggest operating combustion apparatus 25 with a fuel/air ratio less than one, or a method for operating combustion apparatus 25 to facilitate reducing an amount of emissions from apparatus 25. Rather, at column 4, lines 60-62, Schilling et al. describe that "the cooling air exits downstream of the primary combustion zones 61, 63, and 65, and therefore does not affect the NO_x produced therein."

Horner et al. describe a continuous-burning combustor 10 for use with a gas turbine engine. Combustor 10 includes a single dome assembly 22 that includes a swirl cup 28, a dome plate 32, and a swirler 38. Swirler 38 receives a fuel nozzle 26 therethrough that supplies fuel and water to a combustion chamber 14 defined within combustor 10. Notably, Horner et al. do not describe nor suggest operating combustor 10 with a combustor fuel/air mixture equivalence ratio less than one. Furthermore, Horner et al. also describe, for example, at column 2, lines 18-21, problems associated with water injection, and at column 1, lines 33-47, that one object of the invention "is to provide an improved combustor dome assembly design which may improve CO and NO_x emission performance with or without water injection."

Borkowicz et al. describe a gas turbine 10 including a plurality of combustors 14 that extend circumferentially within gas turbine 10. Each combustor 14 includes a single dome, a combustion chamber 70, and a plurality of fuel nozzles 32 that are arranged about a longitudinal axis of combustor 14. Each combustor fuel chamber 70 is downstream and in flow communication with the dome. Each fuel nozzle 32 includes a premix passage 60 and a diffusion passage 74. Premix passage 60 is in flow communication with a plurality of premix

fuel distribution tubes 66. Notably, Borkowicz et al. do not describe nor suggest operating combustor 14 with a combustor fuel/air mixture equivalence ratio less than one. Furthermore, Borkowicz et al. describe that water injection is optional because the multiple premixing sections or tubes allow a thorough premixing of fuel and air prior to burning, which, as described at column 2, line 36, "ultimately results in low NO_x levels."

Joshi et al. describe a duel fuel mixer 24 for use with a single domed combustor 10. Mixer 24 includes a swirl cup 22 and inner and outer swirlers 26 and 28, respectively. Mixer 24 is in flow communication with gas fuel passages 38 and a liquid fuel manifold 40. Notably, Joshi et al. do not describe nor suggest injecting water into combustor 10, but rather at column 1, lines 27-31, Joshi et al. recite that although "the wet techniques (water/steam injection) and selective catalytic reduction have proven themselves in the field, both of these techniques require extensive use of ancillary equipment...[which] drives the cost of energy production higher." Furthermore, at column 1, lines 56-59, Joshi et al. describe that premixing ducts "have been found to be unsatisfactory due to flashback and auto-ignition considerations for modern gas turbine applications."

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. Obviousness cannot be established by merely suggesting that it would have been an obvious to one of ordinary skill in the art to modify Schilling et al. according to the teachings of either Horner et al. or Borkowicz et al., and also using the teachings of Joshi et al. More specifically, as is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. Schilling et al., Horner et al., or Borkowicz et al., considered alone or in combination describe or suggest the claimed combination, and Applicants respectfully submit that it would not be obvious to combine Schilling et al. with either Horner et al. or Borkowicz et al. because there is no motivation or suggestion within the prior art to combine the references. Furthermore, in even more contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Horner et al. or Borkowicz et al. with Joshi et al. because there is no motivation to combine the references suggested in the art, and because Joshi et al. teaches away from both Horner et al. and Borkowicz et al. Rather, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching. Only the conclusory statement that "[i]n this case, the teachings are clear to employ water/steam injection into the premixer of a gas turbine combustor in order to lower NOx emissions and/or CO emissions...it is noted that the combination of references applied fully cover applicant's claimed invention" suggests combining the references.

As referenced above, Applicants respectfully submit that the prior art teaches away from the present invention and from each other. More specifically, in contrast to the present invention, Borkowicz et al. and Horner et al. each describe combustors that utilize optional water injection, but are not operable with a fuel/air ratio less than one. Additionally, Borkowicz et al. and Horner et al. are each clearly in contrast with Joshi et al. which specifically teaches away from using water/steam injection at column 1, lines 27-31. Furthermore, at column 1, lines 56-59, Joshi et al. further teach away from Borkowicz et al. by describing that premixing ducts "have been found to be unsatisfactory due to flashback and auto-ignition considerations for modern gas turbine applications." As such, Applicants respectfully submit that Joshi et al. is not properly combinable with, or modifiable with, either Horner et al. or Borkowicz et al. Accordingly, Applicants respectfully submit that because the prior art teaches away from each other, as well as the current invention, that there is no suggestion or motivation to combine either Horner et al. or Borkowicz et al. with Joshi et al.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Furthermore, obvious to try a modification or combination of references is not prima facia obviousness. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicant's disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a

given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Schilling et al. is cited for its teaching of a mulitdomed combustor including premixers, and Borkowicz et al. and Horner et al. are each cited for their teaching of using water/steam injection in a premixer of a gas turbine combustor. More specifically, the present Section 103 rejection is based on an assumption that one skilled in the art could have combined the teachings from the multiple patents to arrive at the claimed invention. However, Applicants respectfully submit that based on the contradictions in teachings between the multiple patents, that one skilled in the art would not have combined the multiple patents to arrive at the present claimed invention. Since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection of Claims 1-4, 6, 8-11, and 15-17 be withdrawn.

Further, and to the extent understood, none of Schilling et al., Horner et al., Borkowicz et al., nor Joshi et al., considered alone or in combination, describe nor suggest the claimed combination, and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 1 recites a method for operating a gas turbine combustor using a water delivery system, the combustor including a plurality of domes, the water delivery system is connected to the gas turbine engine, and the method comprising the step of "operating the gas turbine engine with a combustor including a plurality of domes and with a combustor fuel/air mixture equivalence ratio less than one...supplying at least one of water and steam into the gas turbine engine with the water delivery system..."

None of Schilling et al., Horner et al., Borkowicz et al., or Joshi et al., considered alone or in combination, describe or suggest a method for operating a gas turbine combustor using a water delivery system, wherein the combustor includes a plurality of domes, and the water delivery system is connected to the gas turbine engine, in combination with method steps of operating the gas turbine engine with a combustor including a plurality of domes and with a combustor fuel/air mixture equivalence ratio less than one, and supplying at least one

of water and steam into the gas turbine engine with the water delivery system. Specifically, none of Schilling et al., Horner et al., nor Borkowicz et al., considered alone or in combination, describe or suggest operating a combustor with a fuel/air mixture equivalence ratio less than one, and when Schilling et al., Horner et al., and Borkowicz et al., are considered in combination with Joshi et al., none of Schilling et al., Horner et al., Borkowicz et al., nor Joshi et al., describe or suggest water injection in a combustor that is operable with a fuel/air mixture equivalence ratio less than one. Furthermore, Joshi et al. teach away from Horner et al. and Borkowicz et al. by describing a combustor that is specifically not operable with water injection. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Schilling et al. in view of Horner et al. or Borkowicz et al.

Claims 2-4 depend from independent Claim 1. When the recitations of Claims 2-4 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-4 likewise are patentable over Schilling et al. in view of Horner et al. or Borkowicz et al.

Claim 6 recites a combustor system for a gas turbine engine, wherein the combustor system comprises "a combustor comprising a plurality of domes, at least one of said combustor domes configured to operate with a fuel/air mixture equivalence ratio less than one...a water delivery sub-system connected to the gas turbine engine and configured to supply at least one of water and steam to the gas turbine such that at least one of water and steam is injected into the combustor." None of Schilling et al., Horner et al., Borkowicz et al., or Joshi et al., considered alone or in combination, describe nor suggest a combustor system for a gas turbine engine, wherein the combustor system includes a combustor including a plurality of domes, wherein at least one of the combustor domes is configured to operate with a fuel/air mixture equivalence ratio less than one, in combination a water delivery sub-system connected to the gas turbine engine and configured to supply at least one of water and steam to the gas turbine such that at least one of water and steam is injected into the combustor. Specifically, none of Schilling et al., Horner et al., nor Borkowicz et al., considered alone or in combination, describe or suggest a combustor system for a gas turbine engine including a combustor dome that is configured to operate with a fuel/air mixture equivalence ratio less than one, and when Schilling et al., Horner et al., and Borkowicz et al., are considered in combination with Joshi et al., none of Schilling et al., Horner et al., Borkowicz et al., nor Joshi et al., describe or suggest water injection in a combustor that is operable with a fuel/air mixture equivalence ratio less than one. Furthermore, Joshi et al. teach away from Horner et al. and Borkowicz et al. by describing a combustor that is specifically not operable with water injection. Accordingly, Applicants respectfully submit that Claim 6 is patentable over Schilling et al. in view of Horner et al. or Borkowicz et al.

Claims 8-11 depend from independent Claim 6. When the recitations of Claims 8-11 are considered in combination with the recitations of Claim 6, Applicants submit that dependent Claims 8-11 likewise are patentable over Schilling et al. in view of Horner et al. or Borkowicz et al.

Claims 15-17 depend from Claim 14 which recites a gas turbine engine comprising a combustor system comprising a combustor and a water delivery sub-system...said combustor being a lean premix combustor comprising a plurality of domes...at least one of said domes configured to operate with a fuel/air mixture equivalence ratio less than one...said water delivery sub-system configured to supply at least one of water and steam to the gas turbine engine such that at least one of water and steam is injected into the combustor." None of Schilling et al., Horner et al., Borkowicz et al., or Joshi et al., considered alone or in combination, describe nor suggest a gas turbine engine including a combustor system including a combustor that includes a combustor and a water delivery sub-system, wherein the combustor includes a plurality of domes such that at least one of the domes is configured to operate with a fuel/air mixture equivalence ratio less than one, in combination with a water delivery sub-system configured to supply at least one of water and steam to the gas turbine engine such that at least one of water and steam is injected into the combustor. Specifically, none of Schilling et al., Horner et al., nor Borkowicz et al., considered alone or in combination, describe or suggest operating a combustor with a fuel/air mixture equivalence ratio less than one, and when Schilling et al., Horner et al., and Borkowicz et al., are considered in combination with Joshi et al., none of Schilling et al., Horner et al., Borkowicz et al., nor Joshi et al., describe or suggest water injection in a combustor that is operable with a fuel/air mixture equivalence ratio less than one. Furthermore, Joshi et al., teach away from Horner et al. and Borkowicz et al. by describing a combustor that is specifically not operable with water injection. Accordingly, Applicants respectfully submit that Claim 14 is patentable over Schilling et al. in view of Horner et al. or Borkowicz et al.

Claims 15-17 depend from independent Claim 14. When the recitations of Claims 15-17 are considered in combination with the recitations of Claim 14, Applicants submit that

dependent Claims 15-17 likewise are patentable over Schilling et al. in view of Horner et al. or Borkowicz et al., and further in view of Joshi et al.

For at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1-4, 6, 8-11, and 15-17 be withdrawn.

The rejection of Claims 5, 12-14, and 18-20 under 35 U.S.C. § 103 as being unpatentable over Schilling et al. in view of either Horner et al. or Borkowicz et al., and further in view of Talabisco et al. or Maslak is respectfully traversed.

Schilling et al., Horner et al., and Borkowicz et al. are described above. Talabisco et al. describe a method and apparatus for maintaining a constant level of NO_x and minimizing CO emissions from a gas turbine. The turbine includes a compressor 12 and a combustor 14. Fuel, air, and steam is injected into combustor 14 based on a load of the turbine.

Maslak describes water and steam injection in a cogeneration system 10. System 10 includes a gas turbine 11 including a compressor 12 and a combustor 18. Water and steam are injected based on gas turbine power output.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. Obviousness cannot be established by merely suggesting that it would have been an obvious to one of ordinary skill in the art to modify Schilling et al. according to the teachings of either Horner et al. or Borkowicz et al., and also using the teachings of Talabisco et al. or Maslak. More specifically, as is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Schilling et al., Horner et al., Borkowicz et al., Talabisco et al. or Maslak, describe or suggest the claimed combination, and Applicants respectfully submit that it would not be obvious to combine Schilling et al., with any of Horner et al., Borkowicz et al., Talabisco et al., or Maslak, because there is no motivation or suggestion within the prior art to combine the references. Furthermore, in even more contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Horner et al. or Borkowicz et al. with Joshi et al. because there is no motivation to combine the references suggested in the art, and because Joshi et al. teaches away from both Horner et al. and Borkowicz et al. Rather, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching. Only the conclusory statement that "[i]t would have been obvious to one of ordinary skill in the art to control the steam/water injection by using a first and second mode with a predetermined value, as being notoriously old and well known method in the art" suggests combining the references.

As referenced above, Applicants respectfully submit that the prior art teaches away from the present invention and from each other. More specifically, in contrast to the present invention, Borkowicz et al., Horner et al., Talabisco et al., and Maslak each describe combustors that utilize optional water injection, but are not operable with a fuel/air ratio less than one. Additionally, Borkowicz et al., Horner et al., Talabisco et al., and Maslak are each clearly in contrast with Joshi et al. which specifically teaches away from using water/steam injection at column 1, lines 27-31. Furthermore, at column 1, lines 56-59, Joshi et al. further teach away from Borkowicz et al. by describing that premixing ducts "have been found to be unsatisfactory due to flashback and auto-ignition considerations for modern gas turbine applications." As such, Applicants respectfully submit that Joshi et al. is not properly combinable with, or modifiable with, any of Horner et al., Borkowicz et al., Talabisco et al., or Maslak. Accordingly, Applicants respectfully submit that because the prior art teaches away from each other, as well as the current invention, that there is no suggestion or motivation to combine any of Horner et al., Borkowicz et al., Talabisco et al., or Maslak with Joshi et al.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Furthermore, obvious to try a modification or combination of references is not prima facia obviousness. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicant's disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose

among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Schilling et al. is cited for its teaching of a mulitdomed combustor including premixers, Borkowicz et al. and Horner et al. are each cited for their teaching of using water/steam injection in a premixer of a gas turbine combustor, and Talabisco et al. and Maslak are each cited for controlling steam/water injection using several different modes or based on the load. More specifically, the present Section 103 rejection is based on an assumption that one skilled in the art could have combined the teachings from the multiple patents to arrive at the claimed invention. However, Applicants respectfully submit that based on the contradictions in teachings between the multiple patents, that one skilled in the art would not have combined the multiple patents to arrive at the present claimed invention. Since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present Of course, such a combination is impermissible, and for this reason alone, invention. Applicants request that the Section 103 rejection of Claims 5, 12-14, and 18-20 be withdrawn.

Further, and to the extent understood, none of Schilling et al., Horner et al., Borkowicz et al., or Talabisco et al. or Maslak, considered alone or in combination, describe nor suggest the claimed combination, and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 5 depends from Claim 1 which recites a method for operating a gas turbine combustor using a water delivery system, the combustor including a plurality of domes, the water delivery system is connected to the gas turbine engine, and the method comprising the step of "operating the gas turbine engine with a combustor including a plurality of domes and with a combustor fuel/air mixture equivalence ratio less than one... ...supplying at least one of water and steam into the gas turbine engine with the water delivery system...."

None of Schilling et al., Horner et al., Borkowicz et al., Talabisco et al. or Maslak, considered alone or in combination, describe or suggest a method for operating a gas turbine

combustor using a water delivery system, wherein the combustor includes a plurality of domes, and the water delivery system is connected to the gas turbine engine, in combination with method steps of operating the gas turbine engine with a combustor including a plurality of domes and with a combustor fuel/air mixture equivalence ratio less than one, and supplying at least one of water and steam into the gas turbine engine with the water delivery Specifically, none of none of Schilling et al., Horner et al., Borkowicz et al., Talabisco et al. or Maslak, considered alone or in combination, describe or suggest operating a combustor with a fuel/air mixture equivalence ratio less than one, and when None of Schilling et al., Horner et al., Borkowicz et al., Talabisco et al. or Maslak, are considered in combination with Joshi et al., none None of Schilling et al., Horner et al., Borkowicz et al., Talabisco et al., Maslak, nor Joshi et al., describe or suggest water injection in a combustor that is operable with a fuel/air mixture equivalence ratio less than one. Rather, Joshi et al., teach away from Horner et al. and Borkowicz et al. by describing a combustor that is not operable with water injection. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Schilling et al. in view of either Horner et al. or Borkowicz et al., and further in view of Talabisco et al. or Maslak.

Claim 5 depends from independent Claim 1. When the recitations of Claim 5 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claim 5 likewise is patentable over Schilling et al. in view of Horner et al. or Borkowicz et al., and further in view of Talabisco et al. or Maslak.

Claims 12 and 13 depend from Claim 6 which recites a combustor system for a gas turbine engine, wherein the combustor system comprises "a combustor comprising a plurality of domes, at least one of said combustor domes configured to operate with a fuel/air mixture equivalence ratio less than one...a water delivery sub-system connected to the gas turbine engine and configured to supply at least one of water and steam to the gas turbine such that at least one of water and steam is injected into the combustor None of Schilling et al., Horner et al., Borkowicz et al., or Talabisco et al. or Maslak,, considered alone or in combination, describe nor suggest a combustor system for a gas turbine engine, wherein the combustor system includes a combustor including a plurality of domes, wherein at least one of the combustor domes is configured to operate with a fuel/air mixture equivalence ratio less than one, in combination a water delivery sub-system connected to the gas turbine engine and configured to supply at least one of water and steam to the gas turbine such that at least one

of water and steam is injected into the combustor. Specifically, none of none of Schilling et al., Horner et al., Borkowicz et al., Talabisco et al. or Maslak, considered alone or in combination, describe or suggest operating a combustor with a fuel/air mixture equivalence ratio less than one, and when None of Schilling et al., Horner et al., Borkowicz et al., Talabisco et al. or Maslak, are considered in combination with Joshi et al., none None of Schilling et al., Horner et al., Borkowicz et al., Talabisco et al., Maslak, nor Joshi et al., describe or suggest water injection in a combustor that is operable with a fuel/air mixture equivalence ratio less than one. Rather, Joshi et al., teach away from Horner et al. and Borkowicz et al. by describing a combustor that is not operable with water injection. Accordingly, Applicants respectfully submit that Claim 6 is patentable over Schilling et al. in view of either Horner et al. or Borkowicz et al., and further in view of Talabisco et al. or Maslak.

Claims 12 and 13 depend from independent Claim 6. When the recitations of Claims 12 and 13 are considered in combination with the recitations of Claim 6, Applicants submit that dependent Claims 12 and 13 likewise are patentable over Schilling et al. in view of Horner et al. or Borkowicz et al., and further in view of either Talabisco et al. or Maslak.

Claims 18-20 depend from Claim 14 which recites a gas turbine engine comprising a combustor system comprising a combustor and a water delivery sub-system...said combustor being a lean premix combustor comprising a plurality of domes...at least one of said domes configured to operate with a fuel/air mixture equivalence ratio less than one...said water delivery sub-system configured to supply at least one of water and steam to the gas turbine engine such that at least one of water and steam is injected into the combustor." None of Horner et al., Borkowicz et al., Talabisco et al. or Maslak, considered alone or in combination,, describe nor suggest a gas turbine engine including a combustor system including a combustor that includes a combustor and a water delivery sub-system, wherein the combustor includes a plurality of domes such that at least one of the domes is configured to operate with a fuel/air mixture equivalence ratio less than one, in combination with a water delivery sub-system configured to supply at least one of water and steam to the gas turbine engine such that at least one of water and steam is injected into the combustor. Specifically, none of Horner et al., Borkowicz et al., Talabisco et al. or Maslak, considered alone or in combination,, considered alone or in combination, describe or suggest operating a combustor with a fuel/air mixture equivalence ratio less than one, and when Horner et al., Borkowicz et

al., Talabisco et al. or Maslak, are considered in combination with Joshi et al., none of Horner et al., Borkowicz et al., Talabisco et al., Maslak, nor Joshi et al., describe or suggest water injection in a combustor that is operable with a fuel/air mixture equivalence ratio less than one. Rather, Joshi et al., teach away from Horner et al. and Borkowicz et al. by describing a combustor that is not operable with water injection. For the reasons set forth above, Claim 14 is submitted to be patentable over Schilling et al. in view of either Horner et al. or Borkowicz et al., and further in view of Talabisco et al. or Maslak.

Claims 18-20 depend from independent Claim 14. When the recitations of Claims 18-20 are considered in combination with the recitations of Claim 14, Applicants submit that dependent Claims 18-20 likewise are patentable over Schilling et al. in view of Horner et al. or Borkowicz et al., and further in view of either Talabisco et al. or Maslak.

For at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 5, 12-14, and 18-20 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

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